

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 25-60128-CR-DIMITROULEAS

UNITED STATES OF AMERICA

v.

**CHAD ANTHONY CLARK,
a.k.a. "Chop,"
MAKAIL MALIK KNIGHT-LEWIS
a.k.a "Lil Takeoff,"
DE'ANDRE MAURICE GRIER,
a.k.a. "Lit,"
a.k.a "Bank Head,"
MARK BYRON HANDSPIKE, JR.,
a.k.a. "Weez,"
DENNARD OSHEA DOBARD,
a.k.a. "Smurda," and
DEGGORY RYAN CLARK,
a.k.a. "Deg,"**

Defendants.

**GOVERNMENT'S FIRST RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16. In addition, pursuant to Federal Rule of Criminal Procedure 16.1, on June 4-6, 2025, the undersigned conferred via email with defense counsel of record about the timing and procedures for producing discovery, including the handling of sensitive discovery materials.

- A. 1. Enclosed with discovery, please find copies of audio/video recordings that contain recordings of conversations had by the defendant. The government is in possession of ten (10) cell phones and an iPad. Please contact the undersigned if you would like to inspect any of the devices, subject to a protective order.
- 2. Although the attached statements were not made in response to

interrogation by any person then known to the defendant to be a government agent, the government is voluntarily disclosing them.

3. No defendant testified before the Grand Jury.
4. The defendants' prior criminal records, if any, are provided with discovery.
5. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 99 Northeast 4th Street, Miami, Florida. Please call the undersigned to set up a date and time that is convenient to both parties.

The attachments to the discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the government may intend to introduce at trial.

6. Laboratory analyses of certain substances seized in connection with this case are attached. Additional analyses will be provided upon receipt.
- B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.
- C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and United States v. Agurs, 427 U.S. 97 (1976).
- D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of Giglio v. United States, 405 U.S. 150 (1972), or Napue v. Illinois, 360 U.S. 264 (1959).
- E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice or informant who will testify for the government at trial.
- F. The defendant was not identified in a lineup, show up, photo array or similar identification proceedings.















- G. The government has advised its agents and officers involved in this case to preserve all rough notes.
- H. The government will timely advise the defendant of its intent, if any, to introduce at trial extrinsic act evidence pursuant to F.R.E. 404(b). Pursuant to Local Rule 88.10, the notice will be provided regardless of whether the evidence may be used in the case-in-chief, for impeachment or possible rebuttal, and will include the general nature of the evidence.

You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine).
- I. The defendants are not an aggrieved person, as defined in Title 18, United States Code, Section 2510(11), of any relevant electronic surveillance that was authorized pursuant to 18 U.S.C. §2516 and 18 U.S.C §2518 and that has been unsealed in accordance with 18 U.S.C §2518.
- J. The government has ordered transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.
- K. The government will, upon defense request, deliver to any laboratory presently registered with the Attorney General in compliance with 21 U.S.C. § 822 and § 823 and 21 C.F.R. 1301.13, a sufficient representative sample of any alleged contraband which is the subject of this indictment to allow independent chemical analysis of such sample.
- L. The government does not know of any automobile, vessel, or aircraft allegedly used in the commission of this offense that is in the government's possession.
- M. The government is not aware of any latent fingerprints or palm prints which have been identified by a government expert as those of the defendant. The government will supplement this disclosure if any such fingerprints are identified.
- N. The government will make every possible effort in good faith to stipulate to all facts or points of law the truth and existence of which is not contested and the early resolution of which will expedite trial. These stipulations will be discussed at the discovery conference.










The government is aware of its continuing duty to disclose such newly discovered

additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

Discovery has been provided to all counsel of records via USAfx on or prior to June 9, 2025. The discovery is arranged in 13 labeled folders and includes numerous files including videos from the narcotics sales on the eight dates described in the Indictment. A screenshot of the contents of the folder is below, and screenshots of the contents of the folders is available upon request. Please contact the undersigned if there are issues accessing the discovery or you believe any files are missing.

NAME	
	14. Crim hx and DAVID
	13 FRAUD EVIDENCE
	12. DNA Search Warrants
	5. Other Search Warrants
	2 - Gang Documentation
	4. Police Reports
	9. DEA Analysis
	1 - Buy Walks
	10 - Consent for DNA Newkirk and Wilson
	3. Lease Agreements_Phone Subscriber Information
	8. Jail Calls
	6. Search Warrants 5.12
	11. Deggory CLARK
	7. Surveillance Notes

Collaborators in CLARK ET AL PRODUCTION I

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Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 17, 2025, the undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Corey R. O'Neal

Corey R. O'Neal

Assistant United States Attorney